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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the matter of

Revision to the Commission's Rules  
to ensure compatibility with  
enhanced 911 emergency calling systems

)  
) CC Docket No. 94-102  
)  
) RM-8143  
)

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**Reply Comments of Telident, Inc.**

Telident, Inc., a Minnesota corporation engaged in research, development, design, manufacture and sale of Enhanced 911 telecommunications equipment and services hereby submits its reply comments filed in response to the Commission's Notice of Proposed Rule Making ("NPRM") in the above captioned proceeding

As discussed below, the separation of requirements for Multi Line Telephone Systems (MLTS) and wireless participation in Enhanced 911 today appears to be justified. In contrast, wireless complications and limitations (including the standardization of location information) suggest a longer time frame, with phases, as suggested in the NPRM.

***With respect to MLTS, the technology and industry standards exist TODAY to support Enhanced 911.*** The Enhanced 911 network interface defined in the American National Standard for Telecommunications, ANSI T1.411-1995, is compatible with today's Enhanced 911 features, network, PSAP equipment and PSAP operation. Tariffs supporting this interface already exist in numerous states and are in development in virtually all others.

The coordination role of the FCC is crucial in the evolution of Enhanced 911 to encompass both MLTS and wireless technologies, and the "next generation" Enhanced 911 features. The "next generation" Enhanced 911 system will be defined by Industry Forums, joint experts meetings, and standards

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bodies, with a cooperative effort between local 911 authorities, serving local exchange carriers, MLTS operators and wireless operators. As the Federal Communications Commission's Network Reliability Council has recommended, work must be done in the standards bodies. This work must ensure compatibility with existing Enhanced 911 service and technologies, and it must maintain the high level of reliability demonstrated by today's private networks for Enhanced 911. It must also ensure reasonable compatibility with the installed base of Public Safety equipment. The new features and their associated cost must be assessed as part of the "next generation" Enhanced 911 definition, and must include ISDN inter-networking.

During this period, the Commission should adopt base criteria that have to be met for accessibility to Enhanced 911 service **TODAY**. These criteria should be based on technology and **standards** currently in existence. With respect to MLTS equipment, the technology and standards exist now. Any mandates should reference the appropriate industry standards, and Part 68 modifications should allow registration of equipment that meet these standards. The American National Standard for Telecommunications document ANSI T1.411-1995 defines an existing interface to the Enhanced 911 network for MLTS equipment. Telident's initial comments to this docket proposed wording for modifications to specific rules within part 68 to accommodate this standard.

Some commenters to the NPRM expressed concern regarding ANSI T1.411 and the perceived excessive usage of 911 tandem ports. The interface defined by T1.411 is suitable for connection to the local serving PSTN switch associated with the PBX location or directly to the 9-1-1 tandem. The choice would be based on the local efficiencies and network engineering of the local 9-1-1 system. The T1.411 interface, with the MLTS (and adjunct processor, where applicable) providing the correct caller's emergency service identification (CESID) at call setup, is fully compatible with existing Enhanced 9-1-1 systems so widely deployed throughout the USA today:

- **Without** an additional time consuming query/response sequence while extracting supplementary information;

- **Without** modifications to the existing Enhanced 911 tandems and PSAP equipment;
- **Without** a secondary ALI data base.

Based on the comments to the NPRM, the question of which specific MLTS installations need to, or will be required to comply with a mandate remains complex. TIA/EIA Telecommunications systems bulletin TSB-103 (*PBX and KTS Support of Enhanced 911 Calling Service*) provides some criteria. If there is to be grandfathering, there are tens of thousands of existing MLTS installations (a subset of the total number of existing MLTS installations) that will continue to adversely affect Enhanced 911 systems throughout the USA for many years to come. Further, there is an active after market for used PBX systems that will need to be considered when (and if) grandfathering decisions are made, and considering this re-use of MLTS equipment, any grandfathering must be "installation specific" and not "equipment specific". In other words, a given PBX system itself ought not be grandfathered. Rather, the specific current implementation of that system may be eligible for grandfathering, but if it is sold or moved, that grandfathering should not necessarily apply.

In the final analysis, it would appear that the best approach for the Commission is to require **appropriate** MLTS installations be required to be capable of sending CESID. Further, that the requirement for the implementation of this capability should be left to the purview of the various state regulatory and/or legislative bodies.

Telident would like to commend the Commission its foresight and willingness to take decisive action in this important area. Our careful review of the 100+ comments filed has clearly established that there is strong general consensus with the objective of the proposed rules dealing with MLTS. It is equally clear that such consensus does not exist as it relates to the only partially parallel issues dealing with wireless telephone access to Enhanced 9-1-1.

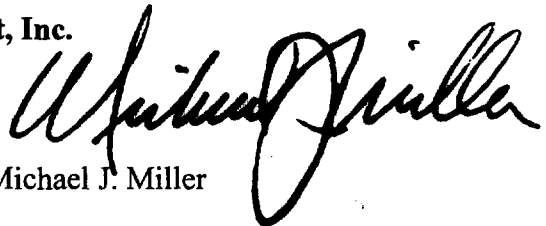
Given the fact that the two issues (MLTS vs. wireless) are only tangentially related, and the fact that there is general consensus on the MLTS proposals and little consensus on the wireless issues, we

suggest that the Commission separate these two distinct issues and proceed to issue promptly its Report and Order on the MLTS portion of the NPRM.

Respectfully submitted.

**Telident, Inc.**

By:

A handwritten signature in black ink, appearing to read "Michael J. Miller". The signature is fluid and cursive, with the first name "Michael" and last name "Miller" clearly distinguishable.

Michael J. Miller

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March 17, 1995